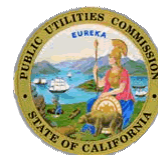


**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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In the Matter of the Joint Application of TAG Mobile, LLC )  
(U-4411-C), TAG Mobile Bankruptcy Sale Entity, LLC, )  
and Vector Holdings Group LLC For Review of the ) Application No. 20-09-013  
Reorganization of TAG Mobile, LLC's Regulated Assets ) (filed Sept. 28, 2020)  
into TAG Mobile Bankruptcy Sale Entity, LLC and the )  
Transfer of Control of TAG Mobile Bankruptcy )  
Sale Entity, LLC to Vector Holdings Group LLC )

**RESPONSE TO ALJ INQUIRY**

**PUBLIC VERSION — ATTACHMENTS 2, 4, 5 AND 6 REDACTED**

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February 16, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

In the Matter of the Joint Application of TAG Mobile, LLC )  
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**RESPONSE TO ALJ INQUIRY**

**PUBLIC VERSION — ATTACHMENTS 2, 4, 5 AND 6 REDACTED**

Pursuant to Rule 9.1 and other applicable provisions of the Commission's Rules of Practice and Procedure, TAG Mobile, LLC ("TAG Mobile"), TAG Mobile Bankruptcy Sale Entity, LLC ("New TAG Mobile"), (collectively referred to as the "TAG Mobile Entities"), and Vector Holdings Group LLC ("Vector") (together with the TAG Mobile Entities, the "Joint Applicants" hereby submit their responses pursuant to the emailed ruling of the Assigned Administrative Law Judge, dated February 2, 2021 ("ALJ Ruling").

The Joint Applicants are entirely willing to provide these responses to questions that the ALJ Ruling characterizes as resulting from "incomplete or unresponsive responses" in the Joint Applicants' Prehearing Conference (PHC) Statement.<sup>1</sup> The Joint Applicants note, however, that several of the current requests address matters that were not raised in the request for the PHC Statement. Other questions request information that has already been provided in the Application and/or the PHC. The Joint Applicants respectfully submit that each of the requests issued in connection with the PHC Ruling was answered in their PHC Statement (except for certain past compliance history for TAG that was unavailable due to the passage of time and the administrative burdens of remaining in bankruptcy status for three years).<sup>2</sup> Regardless, the Joint

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<sup>1</sup> Emailed Ruling Setting Prehearing Conference, A.20-09-013 (Nov. 12, 2020) (including a list of questions/requests to be addressed in a responsive PHC Statement filing) (the "PHC Ruling").

<sup>2</sup> Additionally, Vector initially submitted financial statements for Quadrant Holdings that were mistakenly described as audited. The error, which was repeated in the PHC Statement, was

Applicants endeavor to respond fully to each of the questions in the ALJ Ruling and respectfully submit that if any response is deemed to be less than comprehensive or not fully on point, this results not from an unwillingness to provide a complete response or any intent to be evasive, but rather from the noted unavailability of certain data for TAG Mobile or as a result of confusion regarding the intent of the questions.

**For TAG Mobile, LLC, TAG Mobile Bankruptcy Sale Entity, LLC and Vector Holdings Group LLC:**

1. Explain any active litigation against TAG Mobile, LLC., Vector Holdings Group, LLC. or affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Vector Holdings Group, LLC. and the status of the litigation;

**Joint Applicants Response:** Neither Vector nor its affiliates, officers, directors, or owners are engaged in any active litigation, with the exception of a matter involving Qlixar Corporation and a dispute regarding a commercial real estate lease in Puerto Rico.

Apart from the TAG Mobile bankruptcy proceeding described in the Application, neither TAG Mobile nor New TAG Mobile are engaged in any active litigation.

2. Provide documentation showing payment of \$75 filing fee for transfers, pursuant to the Commission's Rules of Practice and Procedure (Rule) 1.16;

**Joint Applicants Response:** The Joint Applicants are unclear regarding the basis for this request. The Application requests approval to transfer wireless operating assets and customers from TAG Mobile to New TAG Mobile, under the ownership of Vector. Commission Decision 13-05-035 established the filing fee for new or transferred wireless authority ("WIR") to be \$250.<sup>3</sup> This fee is also identified in the Commission's Telecommunications Licensing and Registration website guidance.<sup>4</sup> Accordingly, Parties submitted a check in the amount of \$250 in payment of the fee for transfer of the TAG Mobile WIR (or issuance of a new WIR, as preferred

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inadvertent. As explained below in the response to item 8 on page 6, Quadrant Holdings does not have audited financial statements.

<sup>3</sup> *Decision Addressing Revisions to the Certification Processes for Telephone Corporations Seeking or Holding Certificates of Public Convenience and Necessity, and Wireless Carriers Seeking or Holding Registration*, D.1305035, OP 19 (May 23, 2013).

<sup>4</sup> See <https://www.cpuc.ca.gov/General.aspx?id=1019>.

by the Commission) to New TAG Mobile. Evidence for this payment was provided as Exhibit 4 to the PHC Statement.

Moreover, the ALJ Ruling cites Section 1.16 of the Commission's Rules of Practice and Procedure ("RPP") as the authority for the ostensible \$75 fee. In turn, Section 1.16 points to the Table of Filing Fees located at the end of the RPP. Excluding those fee elements that are clearly inapplicable to communications services (*e.g.*, carriers of goods and passengers, gas, electric, water corporations, railroads), the Table of Filing Fees identifies filing fees applicable to (i) applications to obtain a Certificate of Public Convenience and Necessity ("CPCN") or to sell, mortgage, lease, assign, transfer, or encumber a CPCN, both inapplicable to a wireless provider, and (ii) applications for registration license pursuant to Section 1013 of the California Public Utilities Code, which is expressly inapplicable to commercial mobile radio services (wireless) providers.<sup>5</sup>

Based upon the foregoing, Applicants are unable to identify a \$75 fee that would apply to the Application. Nevertheless, the Joint Applicants will promptly submit payment of any such additional fee (beyond the already submitted \$250), but would respectfully request clarification as to the basis of the fee.

**3.** Provide sworn affidavits from Applicants, affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of TAG Mobile Bankruptcy Sale Entity, LLC and Vector Holdings Group, LLC., that complies with all requirements of Decision 95-12-056, Appendix C and Decision 13-05-035.

**Joint Applicants Response:** Responsive affidavits are provided in **Attachment 1** (*TAG/Vector Response to Request #3 (Group 1)*).

**4.** Provide detailed explanation(s) for any redaction or revision to the sworn affidavits submitted under Exhibit J of the Application 20-09-013 (Application), including any changes in wording of the affidavit as required under Decision 95-12-056, Appendix C and Decision 13-05-035.

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<sup>5</sup> Cal. Pub. Util. Code §1013(m) ("The provisions of this section do not apply to commercial mobile radio service.").

**Joint Applicants Response:** Detailed explanations for each redaction in the Verification and Certification filed as Exhibit J of the Application were set forth as required in the explanation of circumstances included in Exhibit J as “Verification and Certification Attachment.” Vector did not to its knowledge make any changes in wording of the affidavit as required under Decision 95-12-056, Appendix C and Decision 13-05-035 except for non-material changes to tailor the verification and certification statements to the circumstances of the Application and, insofar as the specific language regarding timing for submission of the performance bond for New TAG Mobile was non-materially revised due to the uncertain procedural posture for grant of the Application with respect to the WIR authorization – specifically, whether the Commission will approve transfer of the TAG Mobile WIR to New TAG Mobile or instead, issue a new WIR to New TAG Mobile. However, Vector has used this opportunity to revisit its submission and herewith offers a replacement that provides additional explanations and is executed by all four officers of Vector’s parent, Quadrant Holdings Group, LLC, including the President of Vector, on behalf of Quadrant, Vector and Vector’s affiliates.

**5.** Provide the Applicants’ Federal Communications Commission (FCC) Federal Registration Number (FRN);

**Joint Applicants Response:** TAG Mobile, LLC’s FRN is 0020419784. New TAG is not yet operating as a telecommunications carrier and has not yet registered with the FCC for an FRN. It will do so prior to offering or providing regulated services. Vector is not a telecommunications provider and does not have (or require) an FRN.

**6.** Provide the legal authority for filing under seal for each redacted section in Exhibits 1, 3, 6, 7 and 11 in the PHC Statement;

**Joint Applicants Response:** The exhibits for which confidentiality was requested in the PHC Statement consisted of customer information, an underlying carrier agreement, revenue data and a proprietary territory map. The Joint Applicants believe that each of these exhibits qualifies for confidential treatment pursuant to the provisions of Commission General Order 66-D (G.O. 66-D) and the disclosure requirement provisions of the California Public Records Act (“CPRA”). As discussed in the motion for leave to file under seal accompanying the PHC Statement, Government Code Section 6254(k) expressly protects from public release “[r]ecords, the

disclosure of which is exempted or prohibited pursuant to federal or state law . . .” In turn, numerous federal and state laws protect against disclosure of sensitive commercial and financially significant information. *See, e.g.*, 5 U.S.C. § 552(b)(4) (protecting against disclosure under the federal Freedom of Information Act (FOIA) “trade secrets and commercial or financial information obtained from a person and privileged or confidential”).

Exhibit 1 consisted of TAG Mobile customer numbers, information that is commonly recognized as competitively sensitive information warranting protection from disclosure. Exhibit 3 provided a private commercial agreement between the TAG Entities and an underlying carrier. The agreement was individually negotiated, heightening the commercial sensitivity of the contents, and in addition contained (and was subject to) strong confidentiality provisions which prohibit public disclosure and require that any confidential disclosure be as narrowly tailored as possible. Exhibit 6 and 7 consisted of TAG Mobile financial information, specifically revenue data, which also is commonly recognized as protected by federal FOIA provisions as well as the open records provisions of a number of non-federal jurisdictions. Finally, Exhibit 11 provided proprietary mapping information related to TAG Mobile’s operations. While other forms of territorial delineation for carrier operations may be disclosed publicly (*e.g.*, exchange lists, wire centers and incumbent territories in tariffs or public filings), maps may remain confidential insofar as they include non-public details, *e.g.*, underlying facilities, or other operational details not publicly disclosed. As such, they may constitute sensitive commercial information and, indeed hold material commercial value as a result.

7. Identify information in the public record of any state or federal agency, court of law or accessible by internet search within each redacted section for Exhibits 1, 3, 6, 7 and 11 to the PHC Statement;

**Joint Applicants Response:** Exhibits 1, 6, 7 and 11 to the PHC Statement consisted of (i) confidential and proprietary information of TAG Mobile, LLC, specifically customer information, financial information and proprietary mapping data. Exhibit 3 contains a private commercial services agreement with an underlying carrier which will support New TAG Mobile operations post-close. TAG Mobile maintains this information as confidential and is not aware that any of the materials submitted in these PHC Statement exhibits has been placed on the public record of any state or federal agency or court of law or would be accessible by Internet

search. Similarly, the carrier agreement in Exhibit 3 is maintained confidentially, and includes strong provisions expressly prohibiting public disclosure by either party. Consequently, to the best of Joint Applicants' knowledge, this agreement has not been disclosed in any court, agency or on the Internet.

8. Provide 2018 and 2019 balance sheets or income statements, audited by a certified public accountant, for TAG Mobile, LLC. and Quadrant Holdings, LLC. in its entirety as the information provided in Exhibit B of the Application was not an audited balance sheet or income statement;

**Joint Applicants Response:** TAG Mobile does not have audited balance sheets or income statements for 2018 or 2019. TAG Mobile does have monthly income statements covering the time period from June 29, 2011 through December 31, 2020, provided, under seal, as **Confidential Attachment 2** (*TAG Response to Request #8 (Group 1)*), with an accompanying request for confidential treatment.

Quadrant Holdings does not have audited financials. Its 2018-2019 unaudited financials were submitted as Exhibit B to the Application. (Vector regrets that these statements were described as audited in the application and, again, in the PHC Statement.) Vector also does not have audited financial statements, but will establish that it has the required financial resources through an alternate showing established under Commission protocols, specifically submission of a performance bond in the amount of \$25,000.<sup>6</sup> A copy of Vector's bond is provided as **Attachment 3** (*Vector Response to Request #8 (Group 1)*).

9. Identify and explain any ownership or involvement that Ed Lateef, Lubna Lateef or Limelight Capital, LLC. will have on New TAG Mobile, LLC. or Vector Holdings Group, LLC.;

**Joint Applicants Response:** Ed Lateef, Lubna Lateef and Limelight Capital, LLC are equity interest claimants in the Chapter 11 Bankruptcy. They have no ownership or other involvement with Vector. Upon consummation of the proposed transaction, they will cease to hold any

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<sup>6</sup> See, e.g., *Application for Authority to Transfer Certificate of Public Convenience and Necessity of Bridgcom LLC, an IER Operating in California, to Bridgcom, Inc.*, Administrative Law Judge Ruling Requiring Applicant to File Additional Financial Documentation Within 30 Days in Order to Avoid Dismissal of Application, A.0408006, Exhibit A (Apr. 21, 2005) (listing among the "acceptable forms of financial documentation" numerous alternatives including (b)(1) "Cash or cash equivalent, including cashier's check, sight draft, performance bond proceeds, or traveler's checks."

ownership interests or other form of control in New TAG. Post-close, they will have no ownership or other involvement with New TAG and Vector.

**10.** Provide the status of any application pending resolution with the FCC related to this proceeding.

**Joint Applicants' Response:** As of the date of this filing, the FCC applications for approval of the proposed transaction, including the application for amendment to the Compliance Plan of TAG Mobile and transfer of control applications pursuant to 47. U.S.C. Sec. 214, remain pending. Counsel for the Applicants remains in contact with key FCC Staff and has been informed that the FCC has no current questions regarding the proposed transaction.

**For TAG Mobile, LLC. and TAG Mobile Bankruptcy Sale Entity, LLC. only:**

An involuntary petition in bankruptcy was filed against TAG Mobile, LLC (“TAG”) on October 1, 2017. The Order for Relief placing TAG in bankruptcy was entered January 30, 2018. Robert Yaquinto, Jr. was appointed Chapter 11 Trustee on October 11, 2018. Since that time, TAG has operated under the control of the Chapter 11 Trustee. The historical data has for the most part been preserved, some has been lost in moving locations and in software platform transitions.

**1.** Provide an estimate of Lifeline and non-Lifeline customers for TAG Mobile, LLC. in California **per month** beginning June 29, 2011 through December 31, 2014;

**TAG Entities Response:** TAG has no data regarding the number of California Lifeline and non-Lifeline customers for the period from June 29, 2011 through December 31, 2014 because TAG did not begin providing service to California customers or generating revenue in California until January 2015.

**2.** Provide Total monthly California intrastate revenues from non-Lifeline customers **per month** beginning June 29, 2011 through December 31, 2020;

**TAG Entities Response:** TAG Mobile did not have California customers prior to January 2015; therefore there are no data for the period from June 20, 2011 through December 31, 2014. TAG’s confidential filing contains information regarding monthly revenue for California non-Lifeline



customers going back to October 2017. (See **Confidential Attachment 4** (*TAG Response to Request #2 (Group 2)*), submitted separately under seal with an accompanying request for confidential treatment.) In 2017, TAG Mobile began using its current billing platform, V-Care. California non-Lifeline customer revenue information prior to that time was generated using a prior billing platform called H20. TAG's employees no longer have access to the prior billing platform.

**3. Provide Total monthly California intrastate revenues from Lifeline customers per month beginning June 29, 2011 through December 31, 2020;**

**TAG Entities Response:** TAG has no data prior to January 2015 when it began providing service and generating revenue from California customers. TAG's confidential filing contains information regarding monthly revenue for California Lifeline customers since it began providing service in January 2015. (See **Confidential Attachment 5** (*TAG Response to Request #3 (Group 2)*), submitted separately under seal with an accompanying request for confidential treatment.)

**4. Provide monthly audited income statements for TAG Mobile, LLC. beginning June 29, 2011 through December 31, 2020;**

**TAG Entities Response:** TAG Mobile, LLC does not have audited income statements for the period in question, but is providing monthly income statements for June 29, 2011 through December 31, 2020. See **Confidential Attachment 2** (*TAG Response to Request #8 (Group 1)*)

**5. Explain in detail the reason that intrastate revenue for non-Lifeline customers were not reported from July 2011 through December 2020; and,**

**TAG Entities Response:** From June 29, 2011 through December 31, 2014, TAG Mobile did not have any California customers and, therefore, had no California intrastate revenue. When TAG Mobile began serving California customers, it relied on a compliance consultant and other third-party vendors as is common in the telecommunications industry. Unfortunately, a miscommunication among TAG Mobile's vendors resulted in its compliance consultant, Compliance Solutions, Inc. ("CSI"), not receiving non-Lifeline revenue information for California customers starting in January 2015. In responding to these requests, TAG Mobile's Trustee discovered this miscommunication. TAG Mobile is working with CSI to ensure

compliance with its revenue reporting obligations going forward and to file appropriate amended reports for historic data where possible.

6. Explain in detail the reason that surcharges were not remitted to CPUC from July 2011 through December 2020 for non-Lifeline customers.

**TAG Entities' Response:** As noted above, TAG Mobile did not have California customers until January 2015. When TAG Mobile began providing California service, it relied on its outside consultant, CSI, to calculate TAG Mobile's CPUC surcharge remittance amounts. It is common practice for telecommunications providers to outsource state and federal tax and regulatory fee calculation, collection, and remittance to third-party compliance specialists. As explained above, Trustee, in responding to these requests, discovered that either through misunderstanding or inadvertence intrastate revenue for non-Lifeline customers from January 2015 through December 2020 was not reported to CSI. Trustee has contacted CSI, and TAG Mobile will work with CSI to ensure that CPUC surcharges are remitted.

**For Vector Holdings Group, LLC only:**

1. Explain the difference in operation and corporate structure between Q LINK Wireless, LLC., Hello Mobile, LLC. and New TAG Mobile, LLC.;

**Vector Response:** Q LINK Wireless, LLC (Q LINK Wireless), Hello Mobile, LLC ("Hello Mobile") are commonly owned direct subsidiaries of Quadrant Holdings, LLC ("Quadrant Holdings"). Q LINK Wireless operates primarily as a wireless Lifeline services provider in over thirty-two (3) jurisdictions and Hello Mobile operates as a provider of prepaid wireless services (to non-Lifeline subscribers).<sup>7</sup> Q LINK Wireless and Hello Mobile will continue their operations, post-close.

At this time, New TAG Mobile is a newly formed subsidiary of TAG Mobile. Upon closing of the transaction, New TAG Mobile will become a direct wholly-owned subsidiary of Vector and an indirect wholly-owned subsidiary of Quadrant Holdings. New TAG Mobile has no operations at this time. Upon closing of the transaction, New TAG Mobile will receive the

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<sup>7</sup> See Application at p.12.

operating assets of TAG Mobile and will operate as a wireless provider of Lifeline and non-Lifeline services in all of the states and territories previously served by TAG Mobile.<sup>8</sup>

With respect to the current and post-close corporate structures of these companies, please see the charts provided as Exhibit F to the Application.

2. Explain the difference in operation and corporate structure between Q LINK Wireless, LLC., Hello Mobile, LLC and Vector Holdings Group, LLC.;

**Vector Response:** As explained above, Q LINK Wireless, Hello Mobile and Vector currently are commonly owned direct subsidiaries of Quadrant Holdings, LLC. Q LINK Wireless operates primarily as a wireless Lifeline services provider in thirty-two (32) jurisdictions and Hello Mobile operates as a provider of prepaid wireless services (to non-Lifeline subscribers). Q LINK Wireless and Hello Mobile will continue their operations, post-close. Vector is a holding company, currently inactive but intended to serve, post-close, as the direct holding company for New TAG Mobile.

3. Explain any limits or restrictions on proposed California Lifeline wireless unlimited data plans, including the terms and conditions resulting in reduction of data speeds and/or disconnection.

**Vector Response:** The Unlimited Smartphone Plan includes data utilized by the smartphone device provided or activated with the Lifeline service. 4G/LTE service and speeds are limited by network availability. This plan will be subject to New TAG Mobile's proposed Terms and Conditions included with the Application as Exhibit H, Attachment 2.

As set forth in the proposed Terms and Conditions, data use under this plan is subject to Section 6 which sets forth the "Acceptable Use Policy" delineating that the plan is intended only for lawful, personal, and non-commercial uses. This section sets forth "prohibited uses" which include those that are unlawful, harmful, or otherwise impact New TAG Mobile's ability or the ability of its underlying carriers to provide the Services to our or their subscribers. If a subscriber uses unlimited services for anything other than personal, non-commercial use or engaging in unauthorized, excessive, or abusive use, including uses prohibited by the Authorized

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<sup>8</sup> These states are identified on pages 4-5 of the Application.

Use Policy, New TAG Mobile may, at its sole discretion, terminate, suspend, modify, or limit the Services, as provided for in Section 9.7 of the proposed Terms and Conditions.

New TAG Mobile's proposed Broadband Transparency Disclosure, included with the Application as Exhibit H, Attachment 4, sets forth the network management practices, performance characteristics, and commercial terms applicable to its mobile wireless broadband Internet access services. As set forth in this disclosure, New TAG Mobile is a Mobile Virtual Network Operator. As such it provides its broadband services entirely by using the facilities of its underlying carrier and much of what consumers may experience in terms of congestion management and video optimization is controlled by the underlying carrier.

4. Provide the following information about Lifeline and non-Lifeline customers from January 1, 2018 through December 31, 2020 of Q LINK Wireless, LLC. and Hello Mobile, LLC. with unlimited data plans:

- a. The **monthly** total number of Lifeline and non-Lifeline customers enrolled in unlimited data plans;
- b. The **monthly** number of Lifeline and non-Lifeline customers, who had data speeds reduced;
- c. The **monthly** number of Lifeline and non-Lifeline customers, who had any or all of their monthly service, including voice, text or data, restricted, limited, or disconnected; and,
- d. The reason for restriction, limitation, or disconnection of service.

**Vector Response:** The requested customer information is provided, separately under seal, as **Confidential Attachment 6** (*Vector Response to Request #4 (Group 3)*), with an accompanying request for confidential treatment.

5. Explain whether any of the Lifeline plans include free mobile hotspot or tethering;

**Vector Response:** The Unlimited Smartphone Plan includes up to 4.5 GB of tethering. Subscribers may purchase unlimited tethering for \$5. The Homework Gap Plan offers a choice of free tablet or hotspot along with 10 GB data for use with either option.

6. Explain the data refill options for the Lifeline plans and which customers are these refill options intended;

**Vector Response:** As discussed in the Application,<sup>9</sup> the proposed service plans for New TAG Mobile include offers for additional data as follows:

\$1 – 200 MB (good for 30 days)

\$5 – 1 GB (good for 30 days)

\$10 – 2 GB (good for 30 days)

\$20 – 4 GB (good for 90 days)

\$25 – 5 GB (good for 90 days)

\$30 – Unlimited (good for 30 days)

These data refill plans will be available to Lifeline and non-Lifeline customers for the Homework Gap Plan.

7. Confirm that Vector Holdings Group, LLC. agree to obtain a performance bond upon approval of the Application;

**Vector Response:** Pursuant to Commission requirements, a performance bond, in the amount of \$25,000, will be obtained for New TAG Mobile, as the wireless registrant. In the Joint Applicants' initial application filing, Vector committed as part of its public interest offerings to obtain a separate \$1,000,000 bond as further assurance regarding the operations of New TAG Mobile post-close. Vector stands by its commitment and will obtain the bond, as described, upon approval of the Application.

8. Disclose and describe any bankruptcies, findings, judgments, convictions, referrals, denials, suspensions, revocations, limitations, settlements, voluntary payments or any other type of monetary forfeitures, including liens, for Applicant, affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Vector Holdings Group, LLC.;

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<sup>9</sup> See Application, Exhibit H at p. 4.

**Vector Response:** These matters are addressed in the affidavit provided for Vector in **Attachment 1**.

**9.** Explain whether New TAG Mobile, LLC, intend to offer retail wireless services in California? If so, please provide approximate start date for such service;

**Vector Response:** New TAG will offer retail wireless services in California, as evidenced by its request for transfer of TAG's Wireless Identification Registration ("WIR") or issuance of a new WIR. New TAG will begin provision of these services promptly following approval of the Application. As discussed in the Application, Joint Applicants seek approval of the Application no later than early May, 2021, in alignment with the Bankruptcy Court schedule.

**10.** Provide an explanation of all sources of income for the operation of New TAG Mobile, LLC;

**Vector Response:** Immediately post-close, New TAG Mobile will operate as a wireless provider in twenty 20 states, delivering services to the existing non-Lifeline and Lifeline customer base of TAG Mobile. Over time, New TAG Mobile may expand its service territory to additional states. Under both scenarios, New TAG Mobile will receive income through provision of wireless services (whether direct paid by customers or reimbursed through federal and state Lifeline programs). Moreover, although not an income source, should New TAG Mobile require financial assistance in future, material support will be available through Quadrant Holdings, as discussed in the Application.

**11.** Provide the detail plan to achieve 100,000 new Lifeline customers annually in the initial three years of approval of the Application;

**Vector Response:** New TAG Mobile will rely on a combination of enrollment methods to achieve this target, including in-person, retail kiosk, and online enrolments to achieve this goal. At this time, no formal detailed plan exists, but it is Vector's intention to use social media advertising to drive online enrollments, in particular utilizing techniques to target such advertising to unserved or underserved communities, including ethnic and rural ones. Vector presently is exploring the development of partnerships with faith-based and community-based organizations with the goal of working with these trusted parties as a means of facilitating enrollment. Vector believes that these kinds of partnerships scan be instrumental to establishing

trust with certain communities that neither the government nor a private entity can rival. Through these partnerships, Vector expects that it will identify ethnic and local media outlets to complement its online advertisement strategy.

**12.** For the homework gap plan, explain whether hotspots be provided free of charge and any restrictions or limitations, including restrictions or limitations on data speed;

**Vector Response:** The proposed Homework Gap Plan offers a choice of a hotspot device free of charge. The hotspot will be able to use 10 GB of 4G/LTE data monthly. 4G/LTE service and speeds are limited by network availability. New TAG Mobile does not plan to limit those speeds. Additional hotspot data will be available for purchase, as described on page 4 of Exhibit H to the Application.<sup>10</sup>

Such use is subject to New TAG Mobile's proposed Terms and Conditions included with the Application as Exhibit H, Attachment 2. As set forth in the proposed Terms and Conditions, data use under this plan is subject to Section 6 which sets forth the "Acceptable Use Policy" delineating that the plan is intended only for lawful, personal, and non-commercial uses. This section sets forth "prohibited uses" which include those that are unlawful, harmful, or otherwise impact New TAG Mobile's ability or the ability of its underlying carriers to provide the Services to our or their subscribers. If a subscriber uses unlimited services for anything other than personal, non-commercial use or engaging in unauthorized, excessive, or abusive use, including uses prohibited by the Authorized Use Policy, New TAG Mobile may, at its sole discretion, terminate, suspend, modify, or limit the Services, as provided for in Section 9.7 of the proposed Terms and Conditions.

New TAG Mobile's proposed Broadband Transparency Disclosure, included with the Application as Exhibit H, Attachment 4, sets forth the network management practices, performance characteristics, and commercial terms applicable to its mobile wireless broadband Internet access services. As set forth in this disclosure, New TAG Mobile is a Mobile Virtual Network Operator. As such it provides its broadband services entirely by using the facilities of its underlying carrier and much of what consumers may experience in terms of congestion management and video optimization is controlled by the underlying carrier.

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<sup>10</sup> The plan also provides unlimited voice and text, which can be accessed by placing the device SIM into a mobile phone.

13. Explain the plan and process to distribute the 1,000 devices to California students, including the billing for those devices, the wireless plans and programs for these devices, the monthly access fees, the payer for the wireless plans and eligibility determination to receive the devices;

**Vector Response:** As the Commission is aware, COVID-19 related stay-at-home mandates have underscored a dire need among California's student population for access to Internet services and Internet-capable devices through which to participate in remote learning programs. Illustrative of the state's response to this need and as discussed on the Commission's website, the California Teleconnect Fund (CTF) program has been collaborating with the California Department of Education (CDE) (as well as a number of participating wireless providers) in a program to provide subsidies for mobile data service plan charges incurred by K-12 public rural and small school districts and medium school districts (the "Distance Learning Discount").<sup>11</sup> While the support available through this particular effort is not expected to be available indefinitely, the critical need will continue (resulting from the pandemic, natural disaster-driven displacements, other challenges to in-classroom learning and the broader need of rural and low-income students for in-home Internet access generally). Consequently, even after the current program expires, Vector expects that the CDE, the Commission and other California state agencies will continue to work to ensure that in-need students have access to adequate broadband access. In support of this effort, Vector proposes to donate 1,000 devices for use by California students, to be distributed through, and pursuant to eligibility frameworks adopted by, the CDE. Vector plans to donate these devices at no charge and without in any respect tying them to services available through New TAG Mobile post-close. Consequently, any charge(s) associated with receipt of the devices or limitations upon recipients' choice of Internet service providers and plans will be at the judgment and discretion of the CDE. Vector will have no role in those decisions.

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<sup>11</sup> See <https://www.cpuc.ca.gov/General.aspx?id=6442464777>. The current program provides discounts to school system costs for mobile data service plans. Based upon the program description, it does not provide devices or discounts on devices.



14. Provide the length of time that New Tag Mobile, LLC. intends to offer the proposed plans to Lifeline customers.

**Vector Response:** Subject to any changes in federal Lifeline or California LifeLine program service requirements and support levels, Vector commits that New TAG Mobile will offer the proposed plans to LifeLine customers in California for at least three years.

### Summary

The Joint Applicants wish to thank the Assigned Administrative Law Judge for the opportunity to more fully present the merits of their Application. They stand ready to cooperate with the Assigned Administrative Law Judge and Commission Staff to resolve any remaining concerns regarding the proposed transaction underlying the Application. As expressed previously, in the Application and as further discussed at the PHC, the Joint Applicants are hopeful that, assisted by such collaboration, the remaining work to complete review of the Application can be accomplished expeditiously to meet the timeline set by the Bankruptcy Court.

Respectfully submitted,

*/s/ Tony S. Lee*

Tony S. Lee, Esq.  
Fletcher, Heald & Hildreth  
1300 N. 17th Street, Suite 1100  
Arlington, VA 22209  
Tel: (703) 812-0442; Fax (703) 812-0486  
Email: lee@fhhlaw.com  
For TAG Mobile, LLC and TAG  
Mobile Bankruptcy Sale Entity, LLC

*/s/ Paul Turner*

Paul Turner  
President, Vector Holdings Group LLC  
200 S. Andrews Avenue, Suite 600  
Fort Lauderdale, FL 33301  
Tel. (954) 482-4249; Fax (305) 402-0224  
Email: pturner@pbyalaw.com

*/s/ Robert Yaquinto, Jr.*

Robert Yaquinto, Jr.  
509 N. Montclair Avenue  
Dallas, TX 75208  
Tel. (214) 942-5502; Fax (214) 946-7601  
Email: rob@syllp.com  
Chapter 11 Bankruptcy Trustee of TAG  
Mobile, LLC

*/s/ Rachelle Chong*

Rachelle Chong  
Law Office of Rachelle Chong  
345 West Portal Ave, Ste. 110  
San Francisco, CA 94127  
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Email: rachelle@chonglaw.net  
Local Counsel for Vector Holdings Group LLC

*/s/ Laurie Dahl Rea*  
Laurie Dahl Rea  
Forshey & Prostok  
777 Main Street, Ste 1550  
Ft. Worth, Texas 76102  
Tel. (817) 877-8855; Fax: (817) 877-4152  
Email: lrea@forsheyprostok.com  
Counsel for Trustee

Dated: February 16, 2021

### SCHEDULE OF ATTACHMENTS

Attachment 1	<b>PUBLIC - ATTACHED</b>	TAG/Vector Response to Request #3 (Group 1)
Attachment 2	<b>CONFIDENTIAL*</b>	TAG Response to Request #8 (Group 1)
Attachment 3	<b>PUBLIC - ATTACHED</b>	Vector Response to Request #8 (Group 1)
Attachment 4	<b>CONFIDENTIAL*</b>	TAG Response to Request #2 (Group 2)
Attachment 5	<b>CONFIDENTIAL*</b>	TAG Response to Request #3 (Group 2)
Attachment 6	<b>CONFIDENTIAL*</b>	Vector Response to Request #4 (Group 3)

\* **CONFIDENTIAL** submissions are being submitted separately under seal  
in combination with a motion for confidential treatment.

## **Attachment 1**

TAG/Vector Response to Request #3 (Group 1)

## VERIFICATION

I, Paul Turner, do hereby state that I am the President of Vector Holdings Group, LLC (“Vector” or “Applicant”), one of the applicants in this proceeding, that I am authorized to issue this Verification and Certification on behalf of Vector and on behalf of the post-sale entity “TAG Mobile Bankruptcy Sale Entity, LLC” (the “New TAG Mobile”), and that I have read the Joint Application (including the associated exhibits) filed in this proceeding.

In further support to the Joint Application, I do hereby attest that:

- The factual statements contained in the Joint Application are, to the best of my knowledge and belief, true and correct. Following consummation of the transaction described in the Joint Application, New TAG Mobile will be a wholly-owned subsidiary of Vector with New TAG Mobile as the entity seeking to provide supported low-income services in California;
- At all times, Vector and New TAG Mobile will comply with all federal and state statutes, rules, and regulations applicable to the designation and registration requested in the Joint Application; and

Following New TAG Mobile’s receipt of a California Wireless Registration, New TAG Mobile will post a continuous (*i.e.*, without a termination date) performance bond in the amount of no less than Twenty-Five Thousand and 00/100 U.S. Dollars (\$25,000) for the first year of operations and in such amount as then required pursuant to decisions of the California Public Utilities Commission (“CPUC” or “Commission”)) for subsequent years, issued by a corporate surety company authorized to transact surety business in California, and with the CPUC listed as the obligee on the bond. Further, I will ensure that New TAG Mobile timely provides a copy of the executed performance bond to the Director of the Communications Division of the CPUC pursuant to an advice letter to the CPUC, within five business days of the issuance of a new or transferred registration to New TAG Mobile, or at such a time and in such a manner as is agreed to with CPUC Staff.

I affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the California Public Utilities Commission’s Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this Certification and Verification, together with the Certification and Verification Attachment, are true and correct.

/s/ Paul Turner  
Paul Turner, President  
Vector Holdings Group, LLC

February 16, 2021

### CERTIFICATION

I, Paul Turner, do hereby state that I am the President of Vector Holdings Group, LLC (“Vector” or “Applicant”), one of the applicants in this proceeding, and of Quadrant Holdings Group LLC (“Quadrant”), its parent company, that I am authorized to issue this Certification on behalf of Vector and Quadrant, as well as on behalf of the post-sale entity “TAG Mobile Bankruptcy Sale Entity, LLC” (the “New TAG Mobile”).

I, Issa Asad, do hereby state that I am the Managing Member of Quadrant, Applicant’s parent company, that I am authorized to issue this Certification on behalf of Quadrant, its subsidiary, Vector, and all of Quadrant’s other subsidiaries (*i.e.*, Vector’s affiliates).

I, Ron Rechtman, do hereby state that I am the Chief Technology Officer of Quadrant and that I am authorized to issue this Verification and Certification on behalf of Quadrant and its subsidiary, Vector.

I, Rafael A. Carvajal, do hereby state that I am the Chief Operating Officer of Quadrant and that I am authorized to issue this Verification and Certification on behalf of Quadrant and its subsidiary, Vector.

We hereby certify that:

Neither applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of applicant, or anyone acting in a management capacity for applicant have: (a) held one of these positions with a company that filed for bankruptcy; (b) ~~been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others;~~ (c) been convicted of a felony; (d) been (to his/her knowledge) the subject of a criminal referral by judge or public agency; (e) ~~had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction;~~ (f) ~~personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of sections 17000 *et seq.*, 17200 *et seq.*, or 17500 *et seq.* of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others;~~ or (g) ~~been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries;~~ or (h) ~~entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.~~ *[Form Note: If Applicant is unable to make this averment, Applicant should strike through this paragraph and provide with its Application an explanation of the circumstances which prevent such averment.]*

~~To the best of applicant's knowledge, neither applicant, any affiliate, officer, director, partner, nor owner of more than 10% of applicant, or any person acting in such capacity whether or not formally appointed, is being or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order. [Form Note: If Applicant is unable to make this averment, Applicant should strike through this paragraph and provide with its Application an explanation of the circumstances which prevent such averment.]~~

We, the undersigned, do affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure, that, to the best of our knowledge, all of the statements and representations made in this Certification, together with the Certification Attachment, are true and correct.

/s/ Paul Turner

Paul Turner  
President  
Vector Holdings Group, LLC  
Quadrant Holdings Group, LLC

/s/ Issa Asad

Issa Asad  
Managing Member  
Quadrant Holdings Group, LLC

/s/ Ron Rechtman

Ron Rechtman  
Chief Technology Officer  
Quadrant Holdings Group, LLC

/s/ Rafael A. Carvajal

Rafael A. Carvajal  
Chief Operating Officer  
Quadrant Holdings Group, LLC

Dated: February 16, 2021

Attachment: Certification Attachment

## CERTIFICATION ATTACHMENT

By this statement and in an abundance of caution in responding to the averments, the Applicant hereby addresses the stricken language in the Certificate and Verification and other potential concerns relating to Q Link Wireless LLC, a future indirect affiliate of New TAG Mobile. This Attachment provides an explanation of the circumstances which prevent, or require a clarification of, the averments in the Certification and Verification. The stricken language from the Verification and Certification is indicated in ***bold and italicized*** text and is followed by the Applicant's clarification and response.

General Disclosure and Disclaimer: Over the course of its existence, an affiliate operating as an eligible telecommunications carrier ("ETC") has been the subject of numerous formal and informal investigations, proceedings, reviews, inquiries, data requests, audits, letters and other undertaking, however denominated, before the Commission and the Federal Communications Commission ("FCC"), as well as other state and federal law enforcement or regulatory agencies in the United States, involving alleged or potential failures to comply with various laws, rules, orders and regulatory requirements. Applicant has not compiled and is not purporting to compile a list of such matters for this verification. However, certain specific matters are identified below. To the extent such matters may have arisen before the Commission, their outcomes are known to this commission. The outcomes of the other matters may be public record information. Subject to the foregoing, Applicant makes the following specific disclosures:

This Verification and Certification provides information for New TAG Mobile and is limited to the entities and people identified here. New TAG Mobile's future affiliates are identified in the Joint Application in Exhibits F and G. New TAG Mobile's owners are Vector Holdings Group, LLC and, indirectly, Quadrant Holdings Group, LLC; the personnel acting in a management capacity for New TAG Mobile are Rafael Carvajal, Ron Rechtman, Paul Turner, and Issa Asad.

***Neither applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of applicant, or anyone acting in a management capacity for applicant have: ... (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others.***

Neither Applicant, nor any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or anyone acting in a management capacity for Applicant have been "found liable" through a conviction or judgment entered against them in either civil or criminal court for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others. Applicant acknowledges that disputes over information presented by an affiliate contributed to adverse decisions, about which this Commission is aware, including one of its own and one from Illinois. A Puerto Rico decision was reconsidered and resolved favorably.

***Neither applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of applicant, or anyone acting in a management capacity for***



***applicant have: ... (e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction;***

Neither Applicant, nor any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or anyone acting in a management capacity for Applicant have had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction by a final order of a public utilities commission, with the exception of those instances referenced in the response related to subsection (b).

By way of further explanation, Applicant acknowledges that, although affiliate Q Link Wireless, LLC has had applications for designation as an eligible telecommunications carrier granted in 32 jurisdictions, such applications have been denied in three, including California, Illinois and Puerto Rico. The Puerto Rico decision was reconsidered and ETC designation was granted. Since August 2019, Mississippi, New York and the U.S. Virgin Islands have granted Q Link ETC designations.

***Neither applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of applicant, or anyone acting in a management capacity for applicant have: ... (f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of sections 17000 et seq., 17200 et seq., or 17500 et seq. of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others;***

Neither Applicant, nor any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or anyone acting in a management capacity for Applicant have entered into a settlement of the type of claims referenced in the averment subsection (f), with the exception of a confidential settlement entered into by an affiliate which is known to the Commission.

Although not the reason for the strike-through, Applicant further states that its owner was falsely charged on July 19, 2014 accident. The matter in which he was falsely accused, resulted in a single, misdemeanor of culpable negligence with no incarceration.

***Neither applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of applicant, or anyone acting in a management capacity for applicant have: ... (g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries;***

Neither Applicant, nor any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or anyone acting in a management capacity for Applicant have been found to violate any such statute, law, or rule, except that over the course of its existence, except that in the normal course of business operating as an ETC an affiliate has been the subject to numerous proceedings, reviews, inquiries, data requests, audits, letters, investigations, and other undertakings, however denominated, before the Commission and the FCC and the Universal Service Administrative Company ("USAC"), as well as other

state regulatory agencies, probing compliance with various regulations. An affiliate with no operations in Illinois was subject to alleged regulatory infractions by a regulatory agency in Illinois, which did not result in penalties or formal allegations of violations by the agency.

***Neither applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of applicant, or anyone acting in a management capacity for applicant have: ... (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.***

Neither Applicant, nor any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or anyone acting in a management capacity for Applicant have entered into a voluntary settlement agreement or made a monetary payment in resolution of any such action by any regulatory body, agency, or attorney general, except that an affiliate provided a such a payment for a late-filing in Kansas C in 2014.

***To the best of applicant's knowledge, neither applicant, any affiliate, officer, director, partner, nor owner of more than 10% of applicant, or any person acting in such capacity whether or not formally appointed, is being or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.***

In the normal course of business operating as an ETC an affiliate has been the subject to numerous proceedings, reviews, inquiries, data requests, audits, letters, investigations, and other undertakings, however denominated, before the Commission and the FCC and none has resulted in formal allegations of violations by the agency.

**Affidavit of Robert Yaquinto, Jr.**

I, Robert Yaquinto, Jr., state that I am the Chapter 11 Trustee of TAG Mobile, LLC ("TAG Mobile") and the managing member of TAG Mobile Bankruptcy Sale Entity, LLC ("New TAG Mobile"), and I am authorized to issue this Affidavit on behalf of the pre-sale New TAG Mobile.

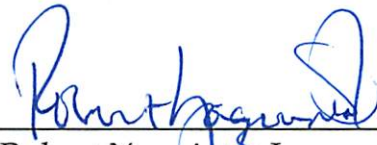
Neither New TAG Mobile nor, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of New TAG Mobile, or anyone acting in a management capacity for New TAG Mobile have: (a) ~~held one of these positions with a company that filed for bankruptcy~~; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (c) been convicted of a felony; (d) been (to his/her knowledge) the subject of a criminal referral by judge or public agency; (e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction; (f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of sections 17000 *et seq.*, 17200 *et seq.*, or 17500 *et seq.* of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; or (g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; or (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.

Out of an abundance of caution, New TAG Mobile cannot affirm the above stricken language. As noted in the transfer of control application, New TAG Mobile is wholly owned by TAG Mobile, LLC ("TAG Mobile"), which is itself wholly owned by Limelight Capital, LLC ("Limelight"). Limelight is wholly owned by Ed and Lubna Lateef. TAG Mobile is currently in a Chapter 11 bankruptcy, and the appointment of the Chapter 11 Trustee in the Bankruptcy Case precipitated the instant transfer of control. Ed and Lubna Lateef were the sole indirect owners of TAG Mobile, via Limelight, before the Bankruptcy Case as well. Therefore, New TAG Mobile cannot affirm that none of its affiliates, officers, directors, partners, agents, 10% or greater (direct or indirect) owners, or anyone acting in a management capacity have filed bankruptcy in that capacity. However, New TAG Mobile would note that Ed and Lubna Lateef are not

involved in the current day-to-day operations of TAG Mobile or New TAG Mobile, and they will not be involved in the operations of New TAG Mobile post-sale. In my capacity as Chapter 11 Trustee of TAG Mobile, LLC, I manage the operations of TAG Mobile and its wholly-owned subsidiary New TAG Mobile in consultation with appropriately experienced employees of TAG Mobile and telecommunications counsel. As a practical matter, Limelight and Ed and Lubna Lateef's interests in TAG Mobile are now subordinate to TAG Mobile's creditors, who must be made whole including interest before Limelight or Ed or Lubna Lateef receive any disbursement from the proceeds of New TAG Mobile's sale to Vector Holdings Group, LLC. A disbursement to Limelight, Ed or Lubna Lateef is unlikely.

To the best of my knowledge, neither New TAG Mobile nor any affiliate, officer, director, partner, nor owner of more than 10% of New TAG Mobile, or any person acting in such capacity whether or not formally appointed, is being or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

I affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this Affidavit are true and correct.

A handwritten signature in blue ink, appearing to read "Robert Yaquinto, Jr.", written over a horizontal line.

Robert Yaquinto, Jr.  
Chapter 11 Trustee  
TAG Mobile, LLC

Dated: 2/12/2021

**Attachment 2**

TAG Response to Request #8 (Group 1)

**CONFIDENTIAL**

(Filed Separately Under Seal)

**Attachment 3**

Vector Response to Request #8 (Group 1)

# Telephone Corporation Surety Bond

Bond No. UCSX372X3564

That We, Vector Holdings Group LLC (hereinafter called Principal) of

499 East Sheridan Street Suite 400, Dania Beach, FL 33004, as principal, and United Surety Insurance Company

(hereinafter called Surety) of 292 Newbury Street - #105, Boston, MA 02115-2801, a corporation duly organized under the laws of Nebraska, as surety, are bound to the Public Utilities Commission (hereinafter called Obligor or CPUC), as Obligor, in accordance with the provisions of the CPUC Decision 13-05-035, issued June 3, 2013, in Rulemaking 11-11-006, in the full amount of Twenty-Five Thousand Dollars (\$25,000.00) for the payment of which we, the said Principal and the said Surety, bind ourselves, our representatives, successors and assigns, each jointly and severally, firmly and unequivocally, by these presents.

**WHEREAS**, the Principal is licensed by the Obligor as a Telephone Corporation under the provisions of the California Public Utilities Code and;

**WHEREAS**, the Principal is required to post a performance bond pursuant to CPUC Decision 13-05-035 for the full and prompt payment of any monetary sanction (i.e. fines, fees, surcharges, taxes, penalties, and restitution) imposed against the Principal, its representatives, successors or assigns, in any CPUC enforcement proceeding brought under the California Public Utilities Code and CPUC Decisions applicable to Telephone Corporations.

**NOW, THEREFORE**, if the Principal shall fully comply with the requirements of the California Public Utilities Code and CPUC Decisions applicable to Telephone Corporations, the above obligation shall be void; otherwise to be continuous and remain in full force and effect. This bond shall become effective on the 8th day of February, 2021 and shall be continuous. Regardless of the number of years this bond may remain in force, the liability of the Surety shall not be cumulative, and the aggregate liability of the Surety for any and all claims, suits, or actions under this bond shall not exceed twenty five thousand dollars (\$25,000.00).

The Surety may cancel this bond by giving thirty (30) days written notice of such cancellation to the CPUC and the Principal by certified mail, it being understood that the Surety shall not be relieved of the liability that may have accrued under this bond prior to the date of cancellation. The Principal must secure a replacement performance bond before the expiration of cancelled performance bond and provide written notice to the CPUC of proof of the replacement performance bond.

The Principal shall provide written notice to the Surety of any attempt by the Principal to transfer or encumber utility property pursuant to the California Public Utilities Code, Article 6, sections 851, *et. Seq.*

Signed, Sealed and Dated this 15th day of February, 2021.

Principal: Vector Holdings Group LLC

By: \_\_\_\_\_

Title: \_\_\_\_\_

Surety: United Surety Insurance Company

By: Kelly A. Specht

Title: Kelly A. Specht, Attorney-in-Fact







**UNITED CASUALTY AND SURETY INSURANCE COMPANY**  
 US Casualty and Surety Insurance Company  
 United Surety Insurance Company

## POWER OF ATTORNEY

**Agency No. 171372**

KNOW ALL MEN BY THESE PRESENTS: That United Casualty and Surety Insurance Company, a corporation of the State of Nebraska, and US Casualty and Surety Insurance Company and United Surety Insurance Company, assumed names of United Casualty and Surety Insurance Company (collectively, the Companies), do by these presents make, constitute and appoint:

**Kelly A. Specht, Kandis Gregory, Richard P. Ford, Thomas C. Buckner, Michael Herranen, Bethany Mercer**

its true and lawful Attorney(s)-in-Fact, each in their separate capacity if more than one is named above, with full power and authority hereby conferred in its name, place and stead, to execute, acknowledge and deliver any and all bonds, recognizances, undertakings or other instruments or contracts of suretyship to include riders, amendments, and consents of surety. This Power of Attorney shall expire without further action on December 31<sup>st</sup>, 2023.

This Power of Attorney is granted under and by authority of the following resolutions adopted by the Board of Directors of the Companies at a meeting duly called and held on the 1<sup>st</sup> day of July, 1993:

Resolved that the President, Treasurer, or Secretary be and they are hereby authorized and empowered to appoint Attorneys-in-Fact of the Company, in its name and as its acts to execute and acknowledge for and on its behalf as Surety any and all bonds, recognizances, contracts of indemnity, waivers of citation and all other writings obligatory in the nature thereof, with power to attach thereto the seal of the Company. Any such writings so executed by such Attorneys-in-Fact shall be binding upon the Company as if they had been duly executed and acknowledged by the regularly elected Officers of the Company in their own proper persons.

That the signature of any officer authorized by Resolutions of this Board and the Company seal may be affixed by facsimile to any power of attorney or special power of attorney or certification of either given for the execution of any bond, undertaking, recognizance or other written obligation in the nature thereof; such signature and seal, when so used being hereby adopted by the Company as the original signature of such officer and the original seal of the Company, to be valid and binding upon the Company with the same force and effect as though manually affixed.

IN WITNESS WHEREOF, the Companies have caused this instrument to be signed and their corporate seals to be hereunto affixed, this 1st day of August, 2019.



Corporate Seals

**UNITED CASUALTY AND SURETY INSURANCE COMPANY**  
 US Casualty and Surety Insurance Company  
 United Surety Insurance Company

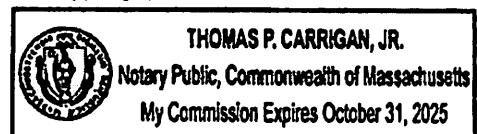
  
 Joel R. Chachkes, Treasurer

Commonwealth of Massachusetts  
 County of Suffolk ss:

On this 1st day of August, 2019, before me, Thomas P. Carrigan, Jr., a notary public, personally appeared Joel R. Chachkes, Treasurer of United Casualty and Surety Insurance Company, US Casualty and Surety Insurance Company and United Surety Insurance Company, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person(s), or the entity on behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the Commonwealth of Massachusetts that the foregoing paragraph is true and correct.  
 WITNESS my hand and seal.

 (Seal)  
 Thomas P. Carrigan, Jr., Notary Public Commission Expires: 10/31/2025




I, Robert F. Thomas, Chief Operating Officer of United Casualty and Surety Insurance Company, US Casualty and Surety Insurance Company and United Surety Insurance Company do hereby certify that the above and foregoing is a true and correct copy of a Power of Attorney, executed by said Companies, which is still in full force and effect; furthermore, the resolutions of the Board of Directors, set out in the Power of Attorney are in full force and effect.

In Witness Whereof, I have hereunto set my hand and affixed the seals of said Companies at Boston, Massachusetts this 15th day of February, 2021.

Corporate Seals



  
 Robert F. Thomas, Chief Operating Officer

TO CONFIRM AUTHENTICITY OF THIS BOND OR DOCUMENT EMAIL: CONFIRMBOND@UNITEDCASUALTY.COM



**Attachment 4**

TAG Response to Request #2 (Group 2)

**CONFIDENTIAL**

(Filed Separately Under Seal)

**Attachment 5**

TAG Response to Request #3 (Group 2)

**CONFIDENTIAL**

(Filed Separately Under Seal)

**Attachment 6**

Vector Response to Request #4 (Group 3)

**CONFIDENTIAL**

(Filed Separately Under Seal)